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Attorneys for Plaintiffs
DEMETRIC DIAZ, OWEN DIAZ,
And LAMAR PATTERSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DIAZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROU; CHARTWELL
STAFFING SERVICES, INC.; and DOES 1-
10 inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF NAVRUZ AVLONI
IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT
CHARTWELL STAFFING INC.'S
MOTION TO COMPEL ARBITRATION**

Date: February 21, 2018

Time: 2:00 p.m.

Location: San Francisco Courthouse

Courtroom 2-17th Floor

450 Golden Gate Avenue

San Francisco, CA 94102

Judge: Hon. William H. Orrick

Complaint Filed: October 16, 2017

Trial Date: Not Set

1 I, NAVRUZ AVLONI, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff
4 Lamar Patterson in this action. I submit this Declaration in support of Plaintiff Lamar
5 Patterson's Opposition to Defendant Chartwell Staffing, Inc.'s Motion to Compel Arbitration. I
6 have personal knowledge of the facts stated herein and if called upon to testify, I could and
7 would competently testify thereto, except as to those matters that are stated upon information and
8 belief.


9 2. Prior to filing this opposition, I searched the JAMS' website for their Orange
10 County office and the search result showed the following location: 500 N. State College Blvd. (at
11 E. Orangewood Ave.) 14th Floor Orange, California 92868. *See*, [https://www.jamsadr.com/jams-](https://www.jamsadr.com/jams-orange-ca)
12 [orange-ca](https://www.jamsadr.com/jams-orange-ca).

13 3. Prior to filing this opposition, I used Google Maps to estimate the distance
14 between JAMS Orange County office at 500 N. State College Blvd, CA 92868 and Berkeley,
15 California. Google Maps showed that the distance is 403 miles via I-5 n and 424 miles via I-5 N
16 and CA-99 N.

17 4. Prior to filing this opposition, I used Google Maps to estimate the distance
18 between JAMS Orange County office and Chartwell's Hayward location (777 Southland Dr.
19 #235, Hayward, CA 94545). Google Maps showed that the distance between these two locations
20 is 390 miles via I-5 N and 412 miles via I-5 N and CA-99 N.

21 5. Prior to filing this opposition, I used Google Maps to estimate the distance
22 between JAMS Orange County office and Tesla's Factory in Fremont, California (45500
23 Fremont Blvd, Fremont, CA 94538). Google Maps showed that the distance between these two
24 locations is 378 miles via I-5 N and 416 miles via I-5 N and CA-99 N.

1 I declare under penalty of perjury, under the laws of the State of California and the
2 United States, that the foregoing is true and correct. Executed on January 30, 2018 in San
3 Anselmo, California.

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6 Navruz Avloni
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